



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 1  
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NAVSTA NEWPORT RI  
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July 16, 2007

James Colter, P.E.  
Remedial Project Manager (Code OPNEEV)  
Facilities Engineering Command, Mid-Atlantic  
Naval Facilities Engineering Command  
9742 Maryland Avenue  
Norfolk, VA 23511-3095

Re: Draft Work Plan for Removal Action at the former Melville Water Tower

Dear Mr. Colter:

EPA reviewed the Draft Work Plan for Removal Action Melville Water Tower, dated July 2007 in light of its consistency with the Non-Time Critical Removal Action Memorandum dated June 15, 2007. Given the goal of completing the removal action during the elementary school's summer break, the work plan does not need to be revised to address the comments, but should be addressed through a letter response and completion of the closure report. Detailed comments are provided in Attachment A.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of Melville Water Tower. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kymberlee Keckler".

Kymberlee Keckler, Remedial Project Manager  
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI  
Cornelia Mueller, NETC, Newport, RI  
Jennifer Stump, Gannet Fleming, Harrisburg, PA  
Steven Parker, Tetra Tech-NUS, Wilmington, MA

## ATTACHMENT A

<u>Page</u>	<u>Comment</u>
p. 5-2, §5.1	The text references other sections incorrectly. The text refers the reader to section 9 instead of section 8 for a description of confirmation sampling. The text refers the reader to section 7 instead of section 6 for a description of construction activities.
p. 8-1, §8.0	The excavation areas (A,B,C,D) have been designated to facilitate offsite disposal and the applicable are for the characterization of the different waste streams. There is only one removal action goal and that is 150 mg/kg lead. Area A will be excavated again after removal of soils with greater than 1000 mg/kg lead. It is EPA's understanding that confirmation samples will be collected to document achievement of 150 mg/kg lead in Area A (overlapped with Area B).
p. 8-1, §8.2	The first sentence states "confirmation sampling will be performed at the excavation areas to demonstrate that the Removal Action Objectives have been achieved." There is only one removal action goal and it is 150 mg/kg lead.
p. 8-2, §8.3	Sample nomenclature is not specified in the work plan. Waste characterization sampling should use a different sample nomenclature to clearly differentiate these samples from the confirmation samples.
p. 9-3, §9.4.7	This section describes regulatory compliance of liquid wastes and specifies that decontamination fluids will be captured daily and disposed off-site. This contradicts the text in section 5.5.3 that states, "Decontamination liquids will be allowed to flow on to the surface of a contaminated area until such time that the area is remediated." Also, text in section 6.2.3 describing the equipment decontamination facility as a stone layer does not suggest daily containerizing of decontamination fluids. Please correct.
p. 10-1, §10	<p>Please include the total volume of soil removed and the date of the final site walk in the closure report.</p> <p>The confirmation samples that document achievement of 150 mg/kg lead at all of the excavation areas must be clearly presented in the closure report. Sample nomenclature and presentation on figures should clearly report the progression of re-excavation and re-sampling with a possible repeat of the process in order to achieve the removal action objective. This needs to be particularly clear for the overlap of Area B and Area A. EPA will use these data to assess appropriate coverage of samples in the Area B/Area A overlap area.</p>